



**U.S. Immigration
and Customs
Enforcement**

February 19, 2016

MEMORANDUM FOR: Tae D. Johnson
Assistant Director, Custody Management

THROUGH: Jay M. Brooks
Deputy Assistant Director, Detention Management Division

FROM: Jennifer Ritchey
Deputy Field Office Director

SUBJECT: York County Prison – Waiver Request

Purpose

Provide a waiver for the Philadelphia Field Office, York County Prison (YCP), as it relates to the Key and Lock Standard in Detention Facilities, Section (V)(C)(4) within the 2008 Performance Based National Detention Standards (PBNDS) which states “in accordance with the ICE PBNDS, Key and Lock Control, section (V)(C)(4), the FOD must ensure either deadbolts or deadlocks shall be used in detainee-accessible areas. Locks not authorized for use in detainee-accessible areas include, but are not limited to: snap-, key-in-knob, thumb-turn, push-button, rim-latch, barrel or slide bolt, and removable-core-type locks (including padlocks). Any such locks in current use shall be phased out and replaced with mortise lock sets and standard cylinders.”

Background

On October 16, 2015, an ODO Compliance Inspection of the YCP reported padlocks are used in the outdoor individual recreation enclosures.

Discussion: A corrective action or a work-around is not available due to the make-up of the overall population of the facility. YCP is a 2,200 bed facility that houses approximately 600 ICE detainees. The remainder of the population includes county inmates and contracted Pennsylvania State inmates.

Individual recreation enclosures are utilized to afford particularly violent and dangerous detainees outdoor recreation while ensuring the safety of staff and other detainees. The recreation enclosures were recently replaced and contain specialized padlocks which do not allow for removal of the key while the lock is in the open position thus eliminating the possibility the lock could be left unattended and utilized by unauthorized personnel. YCP Post Orders were reviewed and updated to include directing staff to be present and observe these recreation enclosures whenever they are in use.

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Recommendation

I recommend the authorization of a waiver for the York County Prison, relating to the Key and Lock Control, section (V)(C)(4), within the 2008 PBNDs, to ensure the safety and security of staff and detainees.

Approve / date Jmb 2/28/17

Disapprove / date _____

Modify / date _____

Needs more discussion _____